Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

Title V Draft Permit, No. V-97-003

KENTUCKY UTILITIES COMPANY, PINEVILLE STATION

Pineville, Kentucky 40977 May 26, 2000 MARION T. WATSON

SOURCE DESCRIPTION, CONTROL EQUIPMENTS & CONSTRUCTION DATES:

E. Unit 01: Dry-bottom, pulverized-coal, wall-fired indirect-heat-exchanger and equipped with

an electrostatic precipitator commenced construction in 1951.

E. Unit 02: Coal conveying and handling equipment operations to include receiving hopper,

crusher, conveyors, stockpile, and haul road commenced construction in 1951.

E. Unit 03: No.2 fuel-oil tangentially-fired indirect-heat-exchanger constructed in 1964.

REGULATION APPLICABILITY:

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on definition of size of emission units, or applicability date of regulation.

Regulations not applicable to Emission Units 01 and 03 due to applicability date or size of unit:

Regulation 401 KAR 59:016, New electric utility steam generating unit, incorporating by reference Title 40 CFR Part 60, Subpart Da, Standards of performance for electric utility steam generating units applicable to an emission unit with a capacity of more than 250 mmBTU/hr and commenced on or after September 19, 1997.

Regulation 401 KAR 60:042, Standards of performance for industrial-commercial-institutional steam generating units, incorporating by reference Title 40 CFR Part 60, Subpart Db, applicable to an emission unit of greater than 100 mmBTU/hr and constructed after June 19, 1984.

Regulation 401 KAR 60:043, Standards of performance for small industrial-commercial-institutional steam generating units, incorporating by reference 40 CFR 60, Subpart Dc, applicable to an emission unit with a design capacity of 100 mmBTU/hr or less and greater than or equal to 10 mmBTU/hr and constructed after June 9, 1989.

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Regulation 59:015, New indirect heat exchangers: applicable to an emission unit with a design capacity of more than 250 mmBTU/hr and constructed on or after August 17, 1971, applicable to an emission unit with a design capacity of 250 mmBTU/hr or less and constructed on or after April 9, 1972, and applicable to an emission unit with a design capacity of more than 250 mmBTU/hr constructed on or after December 22, 1972 when lignite fuel is burned.

Regulations (coal handling) not applicable to Emission Unit 02 due to the definition of an affected facility:

Regulation 401 KAR 60:250, Standards of performance for coal preparation plants, adopting by reference Title 40 CFR Part 60, Subpart Y.

COMMENTS:

- The permittee has not proposed any alternate operating scenario for any of the emission units.
- This permit does not impose any emission cap on any of the emission units.
- The permittee may assure compliance with the sulfur dioxide allowable standard for emission unit 01 by using sulfur dioxide continuous emission monitoring data.
- The permittee will be required to conduct at least two particulate matter mass emission performance tests for emissions unit 01 to demonstrate compliance with allowable particulate matter mass emission standard within the term of this permit. The permittee may assure continuing compliance with the opacity standard using COM data. The permittee may assure continuing compliance with the particulate matter mass emission standard using the COM data as described in the permit. Additional stack testing for particulate matter emissions may be required under circumstances described in the permit.
- Emission unit 02 is subject to Regulation 401 KAR 63:010, Fugitive emissions and is considered to be compliance when using control measures required by regulation.
- The three hour averaging time associated with the particulate matter mass emission standards for emissions units 01 and 03 are applicable during compliance demonstration through performance tests if required by the Division.
- The permittee may ensure compliance with the particulate matter and sulfur dioxide mass emission standards for Emissions Unit 03 by performing fuel analyses on the fuel to be combusted, monitoring the usage rate, and performing calculations as proposed in the permit. Compliance with the opacity standard may be ensured by determining opacity of emissions using US EPA Reference Method 9.
- The permittee shall submit a compliance assurance monitoring (CAM) plan for emission unit 01 with an application for significant revision of those emissions units or with the application for Title V renewal.

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COMMENTS:

• This source is subject to acid rain requirements and the Division has issued Phase II acid rain permit for this facility; Permit Number: AR-96-12.